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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL EXHIBITS IN
SUPPORT OF ITS MOTION FOR
SANCTIONS**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal exhibits to its October 1 Motion for Sanctions (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Portions highlighted in green	Waymo
Exhibits B, C, F, G	Portions highlighted in green	Waymo
Exhibit C	Portions with red boxes	Waymo
Exhibit D	Portions highlighted in green with red boxes	Waymo
Exhibits H, I, J	Entire document	Waymo

3. Portions of Exhibits B, C, D, F, G, H, I, J (identified in the table above) contain, discuss, or refer to Waymo’s confidential business information, including the confidential domain that hosts Waymo’s highly confidential SVN repository and other computer systems. Public disclosure of such information will give bad actors seeking to hack Waymo’s databases a target to attack. Further, there is no public purpose served by disclosing the precise web or IP address at which the servers reside. Waymo’s Motion (portions highlighted in green) and Exhibits H, I and J (entire documents) additionally contain information regarding docket entries at which Defendants have publicly filed information regarding the confidential domain that hosts Waymo’s highly confidential SVN repository and other computer systems. There are several websites and services that automatically pull down public filings from this case (including but not limited to Pacer Pro and twitter.com/big_cases), and unless and until Defendants confirm that they have contacted all such services to remove the improperly filed information, a bad actor could seek out Waymo’s confidential information at the

1 identified docket entries from one or more of these services. Thus, in an abundance of caution,
2 Waymo seeks to file these entire exhibits under seal.

3
4 I declare under penalty of perjury under the laws of the State of California that the foregoing is
5 true and correct, and that this declaration was executed in San Francisco, California, on October 1,
6 2017.

7 By /s/ Lindsay Cooper

8 Lindsay Cooper

9 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven